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November 12, 2020

File Number: 75BZ-323122

VIA ECF

The Honorable Alvin K. Hellerstein
United States District Court for the Southern
District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Courtroom 14D
New York, New York 10007-1312

Cases are consolidated for discovery purposes;
the text in ECF Dkt. No. 52 shall be updated
accordingly.

So ordered,
/s/
Alvin K. Hellerstein
11/16/20

Re: Barry C. Honig, et al. v. John David Hansen, et al., No. 1:20-cv-05872-AKH (S.D.N.Y.);
Grander Holdings, Inc., et al. v. John David Hansen, et al., No. 1:20-cv-08618-AKH
(S.D.N.Y.)

Dear Judge Hellerstein:

We represent plaintiffs Barry C. Honig, GRQ Consultants, Inc., GRQ Consultants, Inc. 401K, GRQ Consultants, Inc. Roth 401K FBO Barry Honig, GRQ Consultants, Inc. Roth 401K FBO Renee Honig, HS Contrarian Investments, LLC, Robert S. Colman, and Robert S. Colman Trust UDT 3/13/85 (the "Plaintiffs") in the action captioned *Barry C. Honig, et al. v. John David Hansen, et al.*, No. 1:20-cv-05872-AKH (the "*Honig* Action"), and write on behalf of all Plaintiffs in this action.

On November 10, 2020, counsel for defendants in the *Honig* Action, John David Hansen and Gregory P. Hanson (the "Defendants"), moved this court to consolidate the *Honig* Action with an action captioned *Grander Holdings, Inc., et al. v. John David Hansen, et al.*, No. 1:20-cv-08618-AKH (the "*Grander* Action"). In a letter to Your Honor, counsel for Defendants accurately indicated that while counsel for Plaintiffs refused to stipulate to complete consolidation, we agreed to consolidate for discovery purposes only.

That same day, Your Honor issued a handwritten order on Defendants' motion to consolidate that appears to have been transcribed at Docket No. 52. However, while the handwritten order appears to state that the *Honig* and *Grander* Actions would be "consolidated for discovery purposes" with all filings to be made in 1:20-cv-05872, the docket entry text states that they were "consolidated for ordinary purposes." (emphases added).

We therefore write to respectfully request clarification that consolidation was ordered for discovery purposes and, if so, request that the entry visible at Docket No. 52 be revised accordingly.

Please feel free to contact me if Your Honor desires any additional information



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Respectfully submitted,

A handwritten signature in black ink, appearing to read "C. Bosch".

Christopher J. Bosch
for SHEPPARD, MULLIN, RICHTER & HAMPTON LLP

cc: All counsel of record (via ECF)

SMRH:4849-4222-4338.2